UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

UNITED	STATES	OF AME	RICA,
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CASE NO. 22-60078 RAR

vs.	
ANDY TOVAR,	
Defendant,	

MOTION TO SEAL

Defendant, ANDY TOVAR, by and through undersigned counsel files this motion to seal and respectfully requests that Defendant's Motion for Order Approving Proposed Capital Case Funding Application and any resulting order be SEALED as the information contained therein is defense work product.

WHEREFORE, Defendant, ANDY TOVAR, respectfully requests this Court grants its Motion to Seal and whatever other relief it deems just and reasonable.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document, with the Clerk of the Court using CM/EFC which sent e-mail notification of such filing to all CM/EFC participants in this case on this 15TH day of MAY 2023.

/s/ Emmanuel Perez Emmanuel Perez, Esquire Fla. Bar No. 586552 Emmanuel Perez & Associates, P.A. 901 Ponce De Leon Boulevard, Suite 101 Coral Gables, Florida 33134 Tel: (305) 442-7443

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